

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON DIVISION**

THE INDEPENDENCE PROJECT, INC., a
New Jersey Non-Profit Corporation, and
RONALD MOORE, Individually,

Plaintiffs,

v.

KIMSCO, INC., a New Jersey Profit
Corporation,

Defendant.

Case No.: 3:17-cv-00464

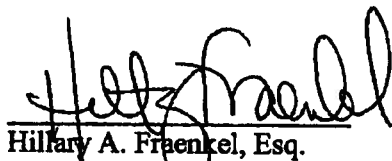
**STIPULATION FOR DISMISSAL WITH PREJUDICE, WITH COURT'S RETENTION OF
JURISDICTION TO ENFORCE SETTLEMENT AGREEMENT**

Plaintiffs, The Independence Project, Inc. and Ronald Moore, and Defendant Kimsco, Inc., pursuant to the Federal Rules of Civil Procedure, hereby move to dismiss this action with prejudice, a resolution of all matters in dispute having been made pursuant to a Settlement Agreement executed between the parties. The parties have stipulated in their agreement that the Court retain jurisdiction to enforce the terms and conditions of the Settlement Agreement.

Respectfully submitted,



Keith Harris, Esq. (KH4604)
Braff, Harris, Sukoneck & Maloof
570 W. Mount Pleasant Ave. Ste. 200
Livingston, NJ 07039
Telephone: (973) 994-6677
Facsimile: (973) 994-1296
kharris@bhsm-law.com
and



Hillary A. Fraenkel, Esq.
Clausen Miller, P.C.
100 Campus Drive, Suite 112
Florham Park, NJ 07932
Telephone: (973) 410-4158
Facsimile: (973) 410-4169
Attorneys for Defendant, Kimsco, Inc.

8/17/17

*As Ordered
per W. Henderson
8/29/17*